

The Law Offices of Avrum J. Rosen, PLLC
Attorneys for Hilary Street
38 New Street
Huntington, New York 11743
Fred S. Kantrow

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

RETURN DATE: **4/12/10**
TIME: **9:30 a.m.**

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In re:

Chapter 7
Case No. 09-78070-reg

HILARY STREET,

Debtor.

-----X
FIRST NATIONAL BANK OF OMAHA,

Plaintiff,

-against-

Adv. Pro. No. 10-8016-reg

HILARY STREET,

Defendant.
-----X

**NOTICE OF DEFENDANT'S MOTION TO IMPOSE SANCTIONS
AGAINST FIRST NATIONAL BANK OF OMAHA AND
ROBERT S. COOPER, ESQ.
PURSUANT TO 28 U.S.C. § 1927 AND TO GRANT FURTHER RELIEF**

PLEASE TAKE NOTICE THAT Hilary Street, the debtor and the defendant (the “Defendant”) in the above captioned adversary proceeding, by and through her attorneys, The Law Offices of Avrum J. Rosen, PLLC, shall move before the Hon. Robert E. Grossman, United States Bankruptcy Judge, for the entry of an Order imposing sanctions against both First National Bank of Omaha and Robert S. Cooper, Esq., pursuant to 28 U.S.C. § 1927 and granting further relief, on **APRIL 12, 2010 at 9:30 a.m.** or as soon thereafter as counsel may be heard, at the United States Bankruptcy Court, 290 Federal Plaza, Central Islip, New York 11722 in Courtroom 860.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief sought in the

Application must conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, as modified by any administrative orders entered in this case, and be filed with the Bankruptcy Court electronically in accordance with General Order #462, by registered users of the Bankruptcy Court's case filing system and, by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect, Microsoft Word, DOS text (ASCII) or a scanned image of the filing, with a hard copy delivered directly to Chambers, and be served in accordance with General Order #462, and upon the The Law Offices of Avrum J. Rosen, PLLC, 38 New Street, Huntington, New York 11743 and the Office of the United States Trustee, Long Island Federal Courthouse, 560 Federal Plaza, Central Islip, New York 11722, so as to be received by no later than 4:00 p.m. on April 5, 2010.

PLEASE TAKE FURTHER NOTICE that only timely objections may be considered by the Court.

Dated: Huntington, New York
February 26, 2010

The Law Offices of Avrum J. Rosen, PLLC
Attorneys for Hilary Street

BY: S/Fred S. Kantrow
Fred S. Kantrow
38 New Street
Huntington, New York 11743
631 423 8527
Fkantrow@avrumrosenlaw.com